

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

April 14, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This office, together with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. ("Plaintiff") in the above-referenced case.

Plaintiff writes to respectfully notify this Court that the Defendants Safa Abdulrahman Gelardi ("Safa"), Vito Gelardi ("Vito"), and IME Companions LLC ("Companions") (Safa, Vito and Companions collectively hereinafter the "Defendants") as well as non-parties Eugene Liddie ("Liddie") and IME Legal Reps ("IMELR") are in contempt of this Court's March 31, 2025 Order and the Third Amended Injunction (hereinafter the "Injunction").

Specifically, Defendants, Liddie, and IMELR were each directed to provide: all website domain names and a list of customers in order to effectuate the terms of the Injunction. See ECF Docket Entry [448-1](#) at §§ III and VII. As is par for the course, they have instead cavalierly ignored this Court's Orders, while Plaintiff has complied with the Injunction.

Plaintiff thus respectfully requests appropriate relief, and thanks this Court for its continued time and attention to this case.

Dated: Lake Success, New York
April 14, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York
April 14, 2025

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

cc: all counsel of record (via ECF).